

**STATEMENT OF WORK
CONTRACT EP-W-11-044
WA 1-15**

1. **TITLE:** FIFRA Dashboards
2. **PERIOD OF PERFORMANCE:** From Date of Issuance through June 5, 2015.
3. **EPA Work Assignment Manager (WAM):**

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4. BACKGROUND

Following the successful launch of the State Dashboards for the Clean Air Act (CAA), Clean Water Act (CWA), and Resource Conservation and Recovery Act (RCRA) programs, available through the Enforcement and Compliance History Online ECHO website, the U.S. Environmental Protection Agency (EPA) seeks to add State dashboards for the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).

EPA works with its federal, state and tribal regulatory partners to assure compliance with pesticide laws and regulations in order to protect human health and the environment. FIFRA, the major federal law governing pesticides, has the objective of providing federal control of pesticide distribution, sale, and use. All pesticides used in the United States must be registered (licensed) by EPA. Registration assures that pesticides will be properly labeled and that, if used in accordance with specifications, they will not cause unreasonable harm to the environment. Use of each registered pesticide must be consistent with use directions contained on the label or labeling.

Information on pesticide establishment registrations is tracked through the Section Seven Tracking System (SSTS) and is a module within the Pesticide Registration Information System (PRISM). SSTS is one of the major systems that supports the Pesticide Program at EPA, and is the only automated system that EPA uses to track pesticide producing establishments and the amount of pesticides they produce. SSTS records the registration of new establishments, and records pesticide production at each establishment. It is a repository for information on the establishments that produce pesticides.

Inspections are the core of the FIFRA compliance monitoring program. FIFRA inspections are conducted by federal, state, and tribal inspectors. Inspections are conducted under sections 5, 7, 8, 9, 13, 24, and 26 of the Act and 40 CFR parts 150-189.

The 12 different types of inspections conducted by EPA and its regulatory partners under FIFRA are as follows:

Good Laboratory Program (GLP) Inspections
Establishment Inspections
Use Inspections
Worker Protection Safety (WPS) Inspections

Marketplace Inspections
For Cause Inspections
Import and Export Inspections
Experimental-Use Permit Inspections
Certified Applicator License and Records Inspections
Restricted-Use Pesticide Dealer Inspection
Restricted-Use Applicator Inspections
Cancellation and Suspension Inspections

Participating states and tribes report back to the agency, semi-annually, on the actual number of inspections conducted by inspection category, and the resulting enforcement actions, also by standard categories (e.g., civil complaint, criminal action, number of warnings) using EPA Form 5700-33H. Regions enter location-specific detailed data into Integrated Compliance Information System (ICIS), as appropriate, by October 30.

5. PURPOSE AND OBJECTIVE

Under this Work Assignment (WA) the Contractor shall develop dashboards and supporting documentation to present FIFRA establishment, inspection, violation, and penalty through the Enforcement & Compliance History Online (ECHO) website to improve the transparency of the FIFRA program. This project is a joint effort between two divisions, the Enforcement Targeting and Data Division (ETDD) and the Monitoring, Assistance, and Media Programs Division (MAMPD), both in the Office of Compliance (OC). Because there is no single data source for the FIFRA information, data from SSTs, ICIS and Form 5700s will be stored in a Microsoft Excel spreadsheet data mart and Excel shall be used to create the charts and reports for the dashboards. A draft mock-up of the dashboards and high-level description of the select logic of the dashboard metrics shall be provided by EPA.

This work will enable EPA to publicly release a draft version of the dashboards and a final version by September 2014.

6. SCOPE OF WORK

Task 1 – Program Management

The Contractor shall develop a work plan describing the necessary steps and estimated hours to complete each of the tasks included in this WA. The work plan shall also include a list of the key personnel to participate in the WA. The Contractor shall also estimate direct costs such as travel, computer cost, typing, etc.

In addition to the monthly progress reports, the Contractor shall prepare monthly and mid-monthly status summaries (in a Microsoft Excel compatible format) to the WAM and the Contracting Officer's Representative (COR). The WAM will provide the template for these monthly and mid-monthly status summaries. The monthly and mid-monthly status reports shall list the following information by task: summaries of current and cumulative costs and LOE expended for the reporting period. The mid-monthly and monthly summaries of costs, and expenditures of LOE shall be provided prior to the progress report.

TASK 1 – DELIVERABLES

Milestone/Reporting Requirement	Schedule
Work Plan	• 25 days from issuance of work assignment
Progress Reports	• Monthly

Mid-Monthly Reports	• Mid-monthly and monthly
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Task 2 – Quality Assurance

This task includes updating the Quality Assurance Project Plan (QAPP), developed by the Contractor under a separate EPA contract (68-C-02-095). The QAPP update shall document how quality assurance and quality control will be applied to the development of the FIFRA dashboards and any data feeds to and from ECHO. The Office of Enforcement and Compliance Assurance (OECA) will use the QAPP to demonstrate compliance with EPA's quality system requirements set forth in EPA Order CIO 2105.0 and EPA "Requirements for Quality Assurance Project Plans," (QA/R-5 dated 3/20/01) <http://epa.gov/quality/qs-docs/r5-final.pdf>. In particular, it is the policy of OECA that QA activities shall be conducted to assure environmental data generated, processed or used for its program requirements will be of known quality, and will achieve prescribed data quality objectives. Furthermore, the data will be adequate and sufficient for their intended use. The updated QAPP shall include:

- a description of how the FIFRA compliance/enforcement data will be generated, compiled, and organized by the Contractor;
- a description of any data feeds to ECHO and procedures for verifying and evaluating these data feeds;
- documentation of select logic, and pull/refresh dates; and
- a description of how the Contractor will evaluate the FIFRA data for completeness, reasonableness, and comparability; and verify that dashboard calculations are correct.

This quality plan shall address the types of quality issues common to FIFRA data and dashboard development projects. In particular, the quality plan shall identify the source of the data used in the dashboards, the collection method (batch, web service, etc.), the refresh cycle, and how the data is displayed on the FIFRA dashboards. This information will also be useful to compare data shown on the dashboards against the data sources.

TASK 2 - DELIVERABLES

Milestone/Reporting Requirement	Schedule
Quality Assurance Project Plan	• 1 week from acceptance of work plan
Revised Quality Assurance Project Plan	• 1 week after receipt of comments from EPA

Task 3 – Document FIFRA dashboard requirements

The Contractor shall document EPA's requirements for the FIFRA dashboards building on the dashboard mock-ups, and draft select logic for the metrics. The final dashboard requirements document shall include a section that is suitable for publication on the State Dashboard site and shall explain the sources and logic of the data metrics in plain language and diagrams.

TASK 3– DELIVERABLES

Milestone/Reporting Requirement	Schedule
Draft Dashboard Requirements	1 week after work plan acceptance.
Final Dashboard Requirements	1 week after EPA WAM comments on draft requirements

Task 4 – Spreadsheet Data Mart Development

The Contractor shall develop a plan for creating, hosting, and updating a spreadsheet data mart to support the FIFRA dashboards. If needed, the Contractor shall incorporate the WAM's comments into a revised requirements document. The requirements document shall include a section suitable for publication on the ECHO state dashboards page explaining in plain language and diagrams what information is presented in the FIFRA dashboards.

The Contractor shall use the plan to build out the functionality and connections necessary to populate the spreadsheets needed to support the dashboards. After successful testing, the Contractor shall work with EPA's staging and production servers.

TASK 4 – DELIVERABLES

Milestone/Reporting Requirement	Schedule
Plan for creating, hosting, and updating spreadsheet data mart	3 weeks after work plan acceptance.
Draft spreadsheet data mart loaded with SSTs, Form 5700 and ICIS data	1 week after EPA WAM comments on plan
Deployment of production data mart to EPA's staging and development servers	2 weeks after draft

Task 5 – Dashboard development

The Contractor shall develop mock-ups of the requested charts and reports.

TASK 5 – DELIVERABLES

Milestone/Reporting Requirement	Schedule
Mock-up of "Dashboard" (user interface and results)	4 weeks after workplan acceptance
Deployment of draft Dashboard for EPA HQ and stakeholder testing	4 weeks after mock-up
Receive MAMPD comments	2 weeks after draft deployment
Incorporate Revisions based on comments	2 weeks after receipt of comments
Deployment of Dashboard to public	No later than 9/30/14

7. **CONTRACT SOW REFERENCE:** Tasks areas II.1, 4, and 5
8. **ANTICIPATED TRAVEL REQUIREMENTS:** Non-local travel by contractor employees under this WA is not anticipated.

9. **ADDITIONAL CONTROL REQUIREMENTS**

- a. Other direct costs. Other direct costs (ODCs) for copying, postage/courier, supplies, computer usage, and graphics are allowed. No other ODCs are allowable as a direct charge to this delivery order without the prior written approval of the Contracting Officer (CO).
- b. Recordkeeping. Upon issuance of written technical direction, the Contractor shall submit for inspection copies of all work in progress at any time under this WA. The Contractor shall develop and maintain files supporting each task.
- c. Resolution of Identified Problems. The Contractor shall contact the COR and/or the CO by telephone to discuss any problems that may adversely affect the work on this WA. Within five (5) calendar days, the Contractor shall follow the phone call with a brief written explanation of the problem, including any actions already taken, and/or recommended solutions to correct the problem. Written explanation shall be made available to the CO, the COR, and the WAM.
- d. Notification of Spending. The Contractor shall notify the COR, CO, and WAM in writing when 75% of the authorized WA LOE/labor hours have been expended.
- e. Contractor Identification. To avoid any perception that contractor personnel are EPA employees, the Contractor shall assure that contractor personnel are clearly identified as independent contractors of EPA when attending meetings with outside parties or visiting field sites. When speaking with the public the contractor should refer all interpretations of policy to the EPA WAM.
- f. Limitation of Contractor Activities. The Contractor shall submit drafts of all deliverables to the WAM for review prior to submission of the final product. The Contractor shall incorporate all WAM comments into all final deliverables, unless otherwise directed by the WAM. The Contractor shall adhere to all applicable EPA management control procedures as implemented by the CO, COR, and WAM.
- g. Deliverable Formatting and Terminology. Throughout this WA, the Contractor shall provide draft and final reports to EPA in electronic and hard copy formats. The WAM and Contractor will use the terminology in this WA to improve the deliverable review process. See Attachment A. The Contractor shall discuss the computer file formats to be used for word processing, spreadsheet, database, and graphics with the WAM prior to file preparation
- h. Deliverables. Major technical reports shall be subject to internal contractor peer review by an expert(s) not directly involved in the mainstream WA tasks. Deliverables shall be prepared with proper adherence to EPA style and format requirements. See Attachment A.
- i. Deadlines. For the purpose of work plan development, the Contractor shall assume the deliverable due dates provided with each task. The EPA WAM will also use written technical direction to change a deadline if management requires any particular deliverable earlier than specified in the following tasks. For any deliverable, no deadline will extend beyond the WA period of performance.
- j. Organizational Conflict of Interest. The Contractor shall warrant that, to the best of the Contractor's knowledge and belief, there are no relevant facts or circumstances which could give rise to an organizational conflict of interest, as defined in FAR Subpart 9.5, or that the Contractor has disclosed all such relevant information.

- k. Notification of Conflicts of Interest Regarding Personnel. The Contractor shall immediately notify the CO and COR of (1) any actual or potential personal conflict of interest with regard to any of its employees working on or having access to information regarding this contract, or (2) any such conflicts concerning subcontractor employees or consultants working on, or having access to information regarding the WA, when such conflicts have been reported to the Contractor. A personal conflict of interest is defined as a relationship of an employee, subcontractor employee, or consultant with an entity that may impair the objectivity of the employee, subcontractor employee, or consultant in performing the contract work
- l. Enforcement Sensitive Information. This WA will not likely involve enforcement sensitive information. In the event that EPA does require the Contractor to handle enforcement sensitive information, the Contractor recognizes that this information shall not be released to the public. Enforcement sensitive refers to records or information compiled for law enforcement purposes (whether administrative, civil, or criminal), the disclosure of which could reasonably be expected to interfere with the enforcement action. It is imperative that all contractor personnel including, but not limited to, subcontractor and consultant personnel assigned to work on this WA - or with access to materials developed pursuant to such efforts - understand that this information is confidential and any disclosure or misuse of the information may result in prosecution to the fullest extent of the law. All Contractor personnel are expected to exercise due diligence in safeguarding, handling, and disposing of any such information.
- m. Handling of Confidential Business Information (CBI). EPA does not anticipate the need for the Contractor to handle CBI under this WA.

Attachment A – Improving the Deliverable Review Process

This WA involves the production of several types of written products ranging from deliberative memos to published reports. The general workflow is for EPA to provide written guidance to the Contractor on the development of these products. The Contractor then develops the initial versions of these products. EPA reviews and revises these documents prior to finalization. Several iterations of development, review, and revision may be necessary prior to product finalization. The WAM and the Contractor will use the following terminology and clarify the expectations for each deliverable via written direction.

Clarification of Terminology

One way for EPA to anticipate the amount of review necessary for a contractor deliverable would be to better define the phase or version of the document in the development, review, and revision process. The following terms shall be used in describing the phase or version of the contractor's deliverables: Concept Memo, First Draft, and Draft Final. These phases are described below.

Concept Memo – A document used to present ideas for discussion. The writing style is not necessarily formal and may be as simple as presenting a list of ideas or options. The concept memo is considered an internal deliberative document and may be the result of prior topic discussions (and brainstorming meetings) between EPA, the Contractor, and other stakeholders. EPA does not expect this type of document to have received senior technical review or the input of a technical editor. However, the concept memo is expected to have received some level of review (e.g., an internal Contractor “peer-to-peer” review) prior to delivery to EPA. Based on past experience, a concept memo is most useful as a tool to guide EPA in determining the desired audience and structure of a future “public-ready” work product.

First Draft – An early version of a document that will ultimately be “public-ready.” The document may still be an internally deliberative product. The writing style is clear but formal. The audience and structure (such as outline

or questions to be answered) have been previously defined by, and reviewed with, EPA. This version is considered appropriate for senior technical review (STR), particularly to confirm that the document answers the questions it is meant to address and is appropriate for the intended audience. It is not unreasonable to expect that STR results in further conversations with EPA. EPA's review of the deliverable is intended to confirm that ideas and concepts are presented as intended.

Draft Final – A “public-ready” document that is ready for distribution to an internal audience (*e.g.*, EPA workgroup) or external audience (*e.g.*, EPA's Docket). The Contractor shall confirm with EPA the intended audience for this document. Additionally, this version of the document shall incorporate EPA's comments on the previous versions of the document. Prior to submission to EPA, the document shall be reviewed by a technical editor to ensure consistency with the Executive Memorandum on 1 June 1998 directing the Executive Departments and Agencies to write in plain language. Specifically, the technical editor shall revise the document to address the following questions.¹

- ❖ Is the document organized to serve the needs of readers?
- ❖ Does the document explain how it is organized and how to use it?
- ❖ Does the document start with items of most interest to reader?
- ❖ Are the chapter, table, and figure titles descriptive and helpful to readers in finding specific information more easily?
- ❖ Are complicated topics summarized before describing all the details?
- ❖ Does the document use the active voice?
- ❖ Does the document include only information readers actually need?
- ❖ Does the document use easy-to-read design features like lists, tables, graphics, and “white space”?
- ❖ Are citations for references clearly identified and does the reader know how to gain access to these references?

Additionally, the Contractor shall get approval from EPA on any other style sheets for Draft Final documents.

Clarification of EPA's Expectations for Deliverables

The deliverable review process can be improved if EPA clearly states its expectations for when STR should take place and the purpose of the STR. Specifically, EPA should identify for the Contractor the “big-picture” objectives and questions for the STR to address. The STR should be able to comment on the clarity of the document and whether the document met the objectives and answered the questions identified by EPA. The Contractor shall share with EPA a summary of the STR.

¹ These questions were modified from the following EPA's website: <http://epa.gov/plainwriting/faqs.html>